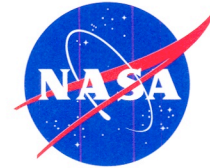


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 8, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Conference and Reception hosted by Explore Mars, Inc., and Space Policy Institute of George Washington University's (GWU), Elliott School of International Affairs on November 9-10, 2011

On November 9-10, 2011, Explore Mars, Inc., and the Space Policy Institute of George Washington University's (GWU), Elliott School of International Affairs, both of which are non-profit organizations under Section 501(c)(3) of the Internal Revenue Code, will host the Women and Mars conference and a reception. The program will take place at George Washington University's Jack Morton Auditorium from 8:30 a.m. – 5 p.m. both days, with a reception at 5 p.m. on November 9th. The event is to facilitate discussions about the growing role of women in efforts related to space exploration – and specifically Mars exploration. Various organizations will provide support for the event, including Boeing, Lockheed Martin, Aerojet, United Space Alliance, Hamilton Sundstrand, Pratt and Whitney, Google, Busek, Space News, the Planetary Society, Women in Aerospace, National Space Society, and the Conrad Foundation. As hosts, however, GWU and Explore Mars, Inc. make all determinations on invitations.

Approximately, 150-200 people were invited to the event. Attendees will include personnel from NASA, ESA, academia, educators, congressional staff, and industry representatives. The food and beverages at the conference and the reception is estimated at \$40 per person.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information on NASA's aerospace programs. Accordingly, NASA employees whose duties do not substantially affect the hosts, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event hosts, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in blue ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone